
DELIVERED ELECTRONICALLY

December 21, 2021

Eric Miller, Esq.
University of Vermont Medical Center
111 Colchester Ave.
Burlington, VT 05401

RE: Docket No. GMCB-022-21con, Pharmacy Expansion and Automation at Holly Court in Williston. Project Cost: \$5,810,888.

Dear Mr. Miller:

Thank you for your responses to the first set of questions for the above referenced project. Additional information is required to complete our review. At this time, please provide the following information:

Financial

1. Because capitalized interest is included in the project cost, we understand that it should also be included in the depreciation of the assets. Please clarify whether this is the case and identify where the capitalized interest is reported within the financial tables submitted.
2. Identify the line item and the dollar amount for the cost of the service contract reflected in the project's financial tables.
3. UVMHC represents that it will capture the prescription dispensing volume shown in the application regardless of whether it implements the proposed project. Populate the top section of Table 3A (without project), titled *Income Statement*, to reflect increased volumes for each proposed year, and address how the dispensing volume affects revenues and expenses.
4. UVMHC's hospital budget submission in FY20 showed a CON of \$3,000,000 for Holly Court. The application and response to questions mention three Holly Court addresses (75, 79 and 83 Holly Court). Explain or clarify what this \$3,000,000 was for and whether



it was spent for a project at Holly Court or was a placeholder for the current Holly Court Pharmacy expansion project.

Architectural

5. On page 6 of the narrative, reference is made to additional renovations to be undertaken to the retail pharmacy at the UHC location. Explain whether the UHC renovations and associated costs are included or excluded in the total project cost and whether the associated costs are included in the financial tables submitted with this application. Plans for the UHC facility will need to be submitted and demonstrate compliance with the 2018 FGI guidelines. Based on the description provided in the narrative, renovations at UHC contain elements that are governed by FGI guidelines.
6. Sheet A-2 First Floor Equipment Plan does not show any equipment in the Pharmacy Room 117. Submit a detailed, labeled Architectural equipment plan available for Pharmacy Room 117, which is needed to evaluate compliance with 2018 FGI 2.1-3.8.8.
7. On page 9 of the narrative, a diagram is provided of the pharmacy layout, but this does not match the “ghosted” underlay image shown on the Engineering drawings. Please explain why these drawings do not match.
8. Clarify where the handwashing station required in 2018 FGI 2.1-4.2.8.7 is located to serve Pharmacy Room 117.
9. Clarify and address where the extemporaneous compounding area with sink and counter is located per 2018 FGI 2.1-4.2.2.1(3).
10. Clarify and address where the Electrical drawings indicate lighting design levels in Pharmacy Room 117 complying with 2018 FGI 2.1-3.8.8.1(1)(d) referencing USP-NF General Chapter <1066> “Physical Environments that Promote Safe Medication Use”; light levels expressed in footcandles could not be identified on drawings.
11. Provide more detailed information regarding the ceiling condition at Fridge Room 125 and Freezer Room 126 to evaluate compliance with 2018 FGI 2.1-7.2.3.3.
12. Provide more detailed information regarding the security features that will be utilized to prevent unauthorized access or intrusion through doors, windows, and walls into Pharmacy Room 117.
13. Provide a summary of ventilation performance data demonstrating compliance with each column of 2018 FGI Table 8.1 for the following space functions contained within the project scope:
 - a. Pharmacy
 - b. Bathroom / Toilet



c. Janitor's Closet

In responding, restate the question in bold font and respond in un-bolded font. Send an electronic copy to me at donna.jerry@vermont.gov and one hard copy (three-hole punched) with a Verification Under Oath to my attention at the Green Mountain Care Board, 144 State Street, Montpelier, Vermont 05602.

If you have any questions, please do not hesitate to contact me at 802-760-8162.

Sincerely,

s/ Donna Jerry

Senior Health Policy Analyst
Green Mountain Care Board

cc. Laura Beliveau
Staff Attorney

